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*Counsel for Defendant  
 Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IRON TRIBE FITNESS, on behalf of itself  
 and all others similarly situated,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:25-cv-03281-CRB

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING TIME TO  
 RESPOND TO THE AMENDED  
 COMPLAINT**

Pursuant to Civil L.R. 6-1(b) and 6.2, Defendant Meta Platforms, Inc. (“Defendant”) and Plaintiff Iron Tribe Fitness (“Plaintiff”) (collectively, the “Parties”) respectfully submit, subject to the Court’s approval, the following Stipulation and Proposed Order Extending Time to Respond to the Amended Complaint.

**STIPULATION**

WHEREAS, on April 11, 2025, Plaintiff filed its Complaint (Dkt. No. 1);

WHEREAS, on October 3, 2025, the Court dismissed the Complaint and gave Plaintiff leave to file an amended complaint within 30 days (Dkt. No. 43);

WHEREAS, on November 3, 2025, Plaintiff filed its Amended Complaint (Dkt. No. 47);

1 WHEREAS, presently Defendant's response to the Amended Complaint is due  
2 November 24, 2025;

3 WHEREAS, Defendant anticipates moving to dismiss the Amended Complaint;

4 WHEREAS, no other events or deadlines already fixed by Court order would be affected  
5 by the time modification requested herein, and

6 WHEREAS, Defendant does not waive, and expressly reserves, all defenses;

7 WHEREFORE, the Parties, by and through their respective counsel, hereby stipulate and  
8 agree to the following, subject to the Court's approval:

- 9 a) Defendant's Motion to Dismiss the Amended Complaint will be due on December  
10 18, 2025;
- 11 b) Plaintiff's Opposition to Defendant's Motion to Dismiss the Amended Complaint  
12 will be due on February 6, 2026; and
- 13 c) Defendant's Reply in Further Support of its Motion to Dismiss the Amended  
14 Complaint will be due on March 10, 2026.
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1 Dated: November 10, 2025

2 Respectfully submitted,

3 /s/ Andrew Yaphe

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/s/ Jonathan D. Uslander

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*Counsel for Plaintiff Iron Tribe Fitness*

19 **FILER'S ATTESTATION**

20 Pursuant to Local Rule 5-1(h)(3), I, Andrew Yaphe, attest that concurrence in filing this  
21 document has been obtained from the other signatories.

22 Dated: November 10, 2025

/s/ Andrew Yaphe  
Andrew Yaphe

24 **PROPOSED ORDER**

25 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

26 Dated: \_\_\_\_\_

HONORABLE CHARLES R. BREYER  
U.S. DISTRICT JUDGE